

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

BRITTANY M. THOMPSON,)	
JENNIFER R. HIGHT,)	
KATHERINE M. BELLows,)	
and DANIELLE L. MCELROY,)	CIVIL ACTION NO.
individually and on behalf of all)	1:14-CV-00390-RWS
others similarly situated who)	
consent to their inclusion in a)	
collective action,)	
)	Jury Trial Demanded
Plaintiffs,)	
)	
v.)	
)	
1715 NORTHSIDE DRIVE, INC.)	
d/b/a Club Babes, a corporation;)	
and C.B. JONES and KAREN)	
KIRK, individuals,)	
)	
Defendants.)	
)	

CONSENT MOTION TO EXTEND THE DEADLINE FOR DEFENDANT
1715 NORTHSIDE DRIVE, INC. TO AMEND ITS ANSWER TO
PLAINTIFFS' COMPLAINT

Pursuant to Federal Rule of Civil Procedure 7 and Northern District of Georgia Local Rule 7.1, Defendant 1715 Northside Drive, Inc. d/b/a Club Babes¹ respectfully moves this Court for an order extending the deadline for Defendant

¹ The d/b/a/ is improperly named. Defendant 1715 Northside Drive, Inc. does business as Diamond Club.

1715 Northside Drive, Inc. to amend its Answer to Plaintiffs' Complaint. (Docket Entry Nos. 1 and 13.)

1. On February 10, 2014, Plaintiffs filed their Complaint. On March 14, 2014, Defendant 1715 Northside Drive, Inc. filed its Answer to Plaintiffs' Complaint. The deadline for Defendant 1715 Northside Drive, Inc. to amend its Answer as a matter of course is April 4, 2014.

2. On March 28, 2014, counsel for Defendant 1715 Northside Drive, Inc. conferred with counsel for Plaintiffs Brittany M. Thompson, Jennifer R. Hight, Katherine M. Bellows, and Danielle L. McElroy ("Plaintiffs"), who agreed to the relief requested herein.

3. On March 28, 2014, counsel for Defendant 1715 Northside Drive, Inc. conferred with counsel for Defendants C.B. Jones and Karen Kirk, who agreed to the relief requested herein.

4. Defendant 1715 Northside Drive, Inc. is in the process of concluding discussions with counsel for both Plaintiffs and Defendants C.B. Jones and Karen Kirk that may obviate the need for Defendant 1715 Northside Drive, Inc. to amend its Answer.

5. The parties state that this request is not for the purpose of delay or prejudice, but instead is for the purpose of potentially simplifying and streamlining the litigation of this lawsuit.

The parties respectfully request that the Court extend the deadline for Defendant 1715 Northside Drive, Inc. to amend its Answer to Plaintiffs' Complaint by two weeks, from April 4, 2014, to and including April 18, 2014.

Dated: March 28, 2014

By:

/s/ W. Anthony Collins, Jr. (with express permission)

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Counsel for Defendant 1715 Northside
Drive, Inc.

CERTIFICATION

In accordance with LR 5.1C, NDGa, I hereby certify that this document has been prepared in 14 point, Times New Roman font.

/s/ Eric Magnus
Eric Magnus

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**ORDER ON CONSENT MOTION TO EXTEND THE DEADLINE FOR
DEFENDANT 1715 NORTHSIDE DRIVE, INC. TO AMEND ITS ANSWER
PLAINTIFFS' COMPLAINT**

This matter comes before the Court on Defendant 1715 Northside Drive, Inc.'s Unopposed Motion to Extend the Deadline for Defendant 1715 Northside Drive, Inc. to Amend Its Answer to Plaintiffs' Complaint. For good cause shown, the Court **GRANTS** the Defendant's Unopposed Motion. Defendant 1715 Northside Drive, Inc.'s deadline to amend its Answer to Plaintiffs' Complaint is

hereby **Extended** to and including April 18, 2014.

SO ORDERED, this ____ day of _____, 2014.

THE HONORABLE RICHARD W. STORY
UNITED STATES DISTRICT JUDGE

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CERTIFICATE OF SERVICE

I certify that on March 28, 2014, I electronically filed the foregoing
CONSENT MOTION TO EXTEND THE DEADLINE FOR DEFENDANT
1715 NORTHSIDE DRIVE, INC. TO AMEND ITS ANSWER TO
PLAINTIFFS' COMPLAINT with the Clerk of the Court using the CM/ECF
system which will automatically send email notification of such filing to the
following attorneys of record:

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